

COOLEY LLP  
MICHAEL A. ATTANASIO (151529)  
(mattanasio@cooley.com)  
BENEDICT Y. HUR (224018)  
(bhur@cooley.com)  
SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
EDUARDO E. SANTACANA (281668)  
(esantacana@cooley.com)  
ARGEMIRA FLÓREZ (331153)  
(aflorez@cooley.com)  
NAIARA TOKER (346145)  
(ntoker@cooley.com)  
HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
THILINI CHANDRASEKERA (333672)  
(tchandrasedkera@cooley.com)  
ISABELLA MCKINLEY CORBO (346226)  
(icorbo@cooley.com)  
CHELSEA HU (357212)  
(chu@cooley.com)  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF ARGEMIRA FLÓREZ IN  
SUPPORT OF DEFENDANT GOOGLE LLC'S  
MOTION TO HOLD PLAINTIFFS TO THEIR  
DISCLOSURES AND REST THEIR CASE  
WITHOUT CALLING MR. RUEMLER**

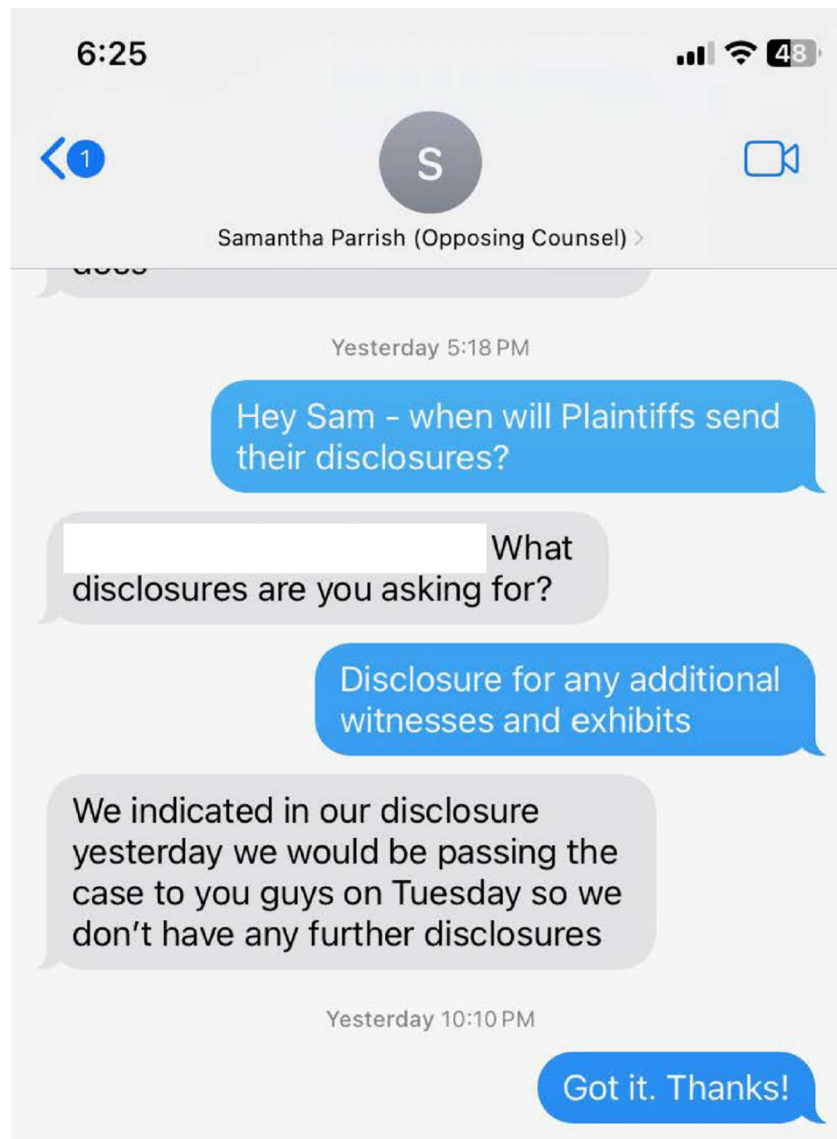
Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Argemira Flórez, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant  
3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of  
4 California and am admitted to practice before this Court. The matters set forth herein are of my  
5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
6 matters. I submit this declaration in support of Google's Motion to Hold Plaintiffs to Their  
7 Disclosures and Rest Their Case Without Calling Mr. Ruemmler, filed concurrently herewith.

8 2. Pursuant to the Parties' process stipulation entered by this Court, Plaintiffs' witness  
9 and exhibit disclosures were due on Saturday, August 23 at 5:00 P.M. for witnesses scheduled to  
10 testify on Tuesday, August 26. At 5:18 P.M. on Saturday, August 23, having received no  
11 communications from Plaintiffs' counsel regarding their disclosures, I texted Plaintiff's counsel  
12 Samantha Parrish to ask "when will Plaintiffs send their disclosures?" After a clarifying question,  
13 Plaintiffs' counsel responded that "We indicated in our disclosure yesterday we would be passing  
14 the case to you guys on Tuesday so we don't have any further disclosures." A true and correct copy  
15 of that text message is shown below.



3. During the course of trial and trial preparation in this matter, Ms. Parrish and I have texted frequently in order to facilitate the constant and needed flow of information between trial teams that facilitates a seamless presentation to the Court and jury each day.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the forgoing is true and correct.

Executed on August 24, 2025, at San Francisco, California.

/s/ Argemira Flórez  
Argemira Flórez